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To FDA/ c/o OMB
5630 Fishers Lane, rm#1061,
Rockville, MD. 20852

Gentlemen,

I am writing in reference to your notice in the Federal Register dated February 3rd, 2003 regarding the "New Import Regulations and Food Safety"

I am a small Customs Broker Company in Los Angeles who handles the import documentation for the importation of fresh fish coming into this country. We prepare all the documentation on behalf of the importers for U.S. Customs, U.S. Dept. of Food and Drug and USDA, to allow the imported seafood shipments to be released from these governmental agencies. Importers hire us and pay us a fee to perform this function on their behalf. In addition, over 70% of shipments are fresh seafood arriving at Los Angeles International Airport.

As proposed in the Federal Register, this would increase the cost of importing at 60% to 70% just to do one entry. In addition to making sure of the requirements set forth in the Federal Register are met. This plan is not practicable for purposes of importing fresh and frozen fish as well. There are many examples in your proposed regulations however, one example would be on how we are supposed to obtain the time the vessel or aircraft blocks in. This information is impossible to obtain and even if this information was available we could not rely on its accuracy.


The information that is required in the Federal Register is already being reported to U.S. Customs on a per shipment basis, and we are using the AMS Customs systems electronically. We are all prepared for and have been doing business with Customs for many years.

This new system as proposed in the Federal Register set forth that we now have to use the internet and requires a lot more data elements which U.S. Customs already has. This puts a tremendous burden on everybody, new software systems, new programming, etc. which is cost prohibitive at this point. FDA should get together with Customs and share data bases or have access to Customs data base. Customs has a proved electronic system and has been in use for years and should be part of this solution as well.

FDA has worked for many years directly with the seafood to develop a "HACCP" Plan which is now required for the importations of seafood, this HACCP PLAN should be part of this solutions as well.

If this program is implemented as set in the federal register it will have negative effects on an industry that has already been hit hard by Government Regulations and has been very costly.

Best Regards,


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